

**AFFIDAVIT**

I, David R. Paramore, being duly sworn, declare and state as follows:

## **I. INTRODUCTION**

5       1. I am a Task Force Officer with United States Secret Service  
6 South Carolina Cyber Fraud Task Force ("USSS SC CFTF") and have been  
7 so employed since January 2023. I am currently assigned to the  
8 Greenville Residence Office to perform duties as a Task Force Officer  
9 (TFO) and investigate financial crimes to include wire fraud,  
10 identity theft, credit card fraud, bank fraud, crypto-currency fraud,  
11 and money laundering. I am currently employed at the city of  
12 Greenville Police Department and have been so employed since June,  
13 2009. I am currently assigned to the Criminal Investigations Division  
14 since June, 2017, under the Economic Crimes Unit. As an Economic  
15 Crimes Detective, I have received training at the South Carolina  
16 Criminal Justice Academy. This training covered aspects of criminal  
17 investigation and law enforcement. I have participated in numerous  
18 investigations of violations of criminal law including matters  
19 involving fraud and white-collar crimes. I have attended numerous  
20 training courses involving financial related crimes and crimes  
21 involving cryptocurrency, specifically the National Computer  
22 Forensics Institute.

## **II. PURPOSE OF AFFIDAVIT**

24       2. This affidavit is made in support of an application for a  
25 warrant to seize the following (the "Subject Funds"):  
26 All United States Currency in the suspect's J.P. Morgan Chase Bank NA  
27 Account #720153678 (the "Subject Account"), and under the business

1 name DreamBig Worldwide Entertainment Industry LLC, and titled to  
2 Alexander Centeno.

3       3. As described more fully below, there is probable cause to  
4 believe that the Subject Funds represent the proceeds of one or more  
5 violations of 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. § 1956 (Money  
6 Laundering), or a conspiracy to commit the same, (the "Subject  
7 Offenses"), committed by unknown persons and transferred into the JP  
8 Morgan Chase Bank NA account #720153678 and are therefore subject to  
9 seizure pursuant to 18 U.S.C. § 981(b) and forfeiture pursuant to 18  
10 U.S.C. § 981(a)(1)(A) & (C).

11       4. In addition, there is probable cause to believe that the  
12 Subject Funds are subject to seizure and forfeiture to the United  
13 States pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853(f) because the  
14 property would, in the event of conviction on the alleged underlying  
15 offenses, be subject to forfeiture, and an order under section 21  
16 U.S.C. § 853(e) would not be sufficient to assure the availability of  
17 the property for forfeiture.

18       5. The facts set forth in this affidavit are based upon my  
19 personal observations, my training and experience, bank  
20 investigators, and information obtained from various law enforcement  
21 personnel and witnesses. This affidavit is intended to show merely  
22 that there is sufficient probable cause for the requested warrants  
23 and does not purport to set forth all of my knowledge of, or  
24 investigation into, this matter.

25       6. Unless specifically indicated otherwise, all conversations  
26 and statements described in this affidavit are related in substance  
27 and in part only, and all dates and amounts are approximations.  
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1                   **III. SUMMARY OF PROBABLE CAUSE**

2         1. USSS and local law enforcement agencies are investigating  
3 unknown criminal actors, who through means of a cyber scheme received  
4 proceeds from a cyber hacking scheme with the intent of obscuring the  
5 nature, origin, and ownership of the funds. The victim unknowingly  
6 answered several phone calls from bank impersonators stating his/her  
7 bank had been compromised and they were freezing her account. The  
8 victim went through several prompts and questions with the bank  
9 impersonators, ultimately allowing the bank impersonators access to  
10 his/her bank account. Approximately eighteen wire transfers occurred  
11 from the victim's account to multiple bank accounts, one of them  
12 being a J.P. Morgan Chase Bank, NA account. Bank fraud investigators  
13 identified that account as holding likely fraudulently obtained funds  
14 and placed a hold on the account.

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16         2. As set forth below, the Subject Account was used by the  
17 suspect to receive the proceeds of the above-described scheme.  
18 Investigating agents believe that the Subject Account was used to  
19 receive the deposited funds that were obtained through fraud.  
20 Therefore, there is probable cause to believe that the Subject Funds  
21 are subject to seizure and forfeiture by the United States.

22                   **IV. STATEMENT OF PROBABLE CAUSE**

23         3. Based on witness interviews, documents obtained from third  
24 parties, reports of interviews conducted by other law enforcement  
25 officers, conversations with other law enforcement officers, and  
26 publicly filed documents, I know the following:

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1                   **A. Background on Financial Account Compromise Scheme**

2         Often in Account Compromise schemes, the victim is contacted  
3 through various means and, in this case, an unknown individual began  
4 communicating with the victim after the notification was made by  
5 telephone, indicating fraud on the victim's bank account. At the  
6 opportune time, the individual identifies themselves as the "fraud  
7 department" and convinces the victim to download a mobile application  
8 to their electronic device such as a computer or cellular phone,  
9 which then gives the illicit actor access to all accounts on a  
10 victim's electronic device. This is a common scheme being tracked by  
11 numerous federal agencies.

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13                   **B. Theft and Account Compromise Scheme**

14         4. Based on conversations, emails and documents received  
15 during this investigation, I learned the following:

16                 a. On or about July 1st, 2025, a resident (R.K.) of  
17 Spartanburg, SC answered a phone call from who they thought was an  
18 Ameris Bank "fraud department". The victim has business accounts with  
19 Ameris Bank under the account names Enchanted Construction LLC,  
20 Cornerstone Real Estate, and ECS Development LLC and, therefore, did  
21 not suspect any fraudulent pretenses. The conversation continued over  
22 a series of phone calls with the Ameris Bank fraud department stating  
23 there was fraud on that account. The illicit actor named  
24 unidentifiable charges on the victim's account and asked the victim  
25 if they were fraudulent, to which he/she replied yes. The victim was  
26 instructed by the illicit actors to download a mobile application  
27 that would be the approval access into the victim's bank account. At  
28 this time, the illicit actors posing as the Ameris Bank fraud

1 department began to gain access to the victim's financial accounts  
2 through that mobile application on the phone and began wiring funds  
3 to multiple bank accounts from the victim's accounts.

4               b. On July 1<sup>st</sup>, unbeknownst to the victim, an outgoing  
5 wire transfer was made against the victim's Ameris Bank account  
6 #2049590538 in the amount of \$100,000.00, and sent to a J.P. Morgan  
7 Chase Bank, NA account #720153678. The recipient of the wire transfer  
8 and J.P. Morgan Chase Bank, NA account holder is identified as  
9 Alexander Centeno of 1021 N 71<sup>st</sup> Terrace Hollywood, FL.

10               c. J.P. Morgan Chase Bank, NA identified this account to  
11 be under the business name DreamBig Worldwide Entertainment Industry,  
12 LLC with the address of 1021 N 71<sup>st</sup> Terrace Hollywood, FL. This  
13 account was opened on June 5<sup>th</sup>, 2025 with minor activity until July  
14 1<sup>st</sup>, 2025, with the incoming wire transfer of \$100,000.00. The name  
15 under the account is listed as Alexander Centeno located at 1021 N  
16 71<sup>st</sup> Terrace Hollywood FL.

17               d. This account was frozen by the bank representative due  
18 to suspected fraud. The bank has held approximately \$100,000.00 in  
19 suspense in this J.P. Morgan Chase, NA account.

20               e. Supporting documentation confirmed that J.P. Morgan  
21 Chase, NA account #720153678 was still on hold to date.

22               f. Records for J.P. Morgan Chase NA bank account  
23 #720153678, belonging to DreamBig Worldwide Entertainment Industry,  
24 show it was opened on June 5<sup>th</sup>, 2025 with only two Zelle transactions  
25 for less than \$300.00. Records show funds coming into the account in  
26 one large wire transfer immediately following periods of little to no  
27 activity. This activity is indicative of known fraud schemes and used  
28 to conceal the nature, source, and ownership of the funds.

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2                   **V. CONCLUSION**

3       5. Based on the facts set forth above, there is probable cause  
4 to believe that the Subject Funds are subject to seizure pursuant to  
5 18 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C.  
6 § 981(a)(1)(C) (rendering subject to forfeiture any property that  
7 constitutes or is derived from proceeds traceable to a violation of  
8 18 U.S.C. § 1343), and § 982 (criminal forfeiture).

9       6. Based on my training and experience, I know that  
10 restraining orders served on banks sometimes fail to preserve the  
11 property for forfeiture because the bank representative receiving the  
12 restraining order fails to put the necessary safeguards in place to  
13 freeze the money in time to prevent the account holder from accessing  
14 the funds electronically, or fails to notify the proper personnel as  
15 to the existence of the order, or the bank exercises its own right of  
16 setoff to satisfy an outstanding debt owed to the bank by the account  
17 holder. In contrast, where electronic funds are concerned, a seizure  
18 warrant guarantees that the funds will be in the Government=s custody  
19 once the warrant is served.

20       7. This affidavit has been reviewed by Assistant U.S. Attorney  
21 Carrie Fisher Sherard.

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23                     
24 Attested to by the applicant in  
25 accordance with the requirements of  
26 Fed. R. Crim. P. 4.1

27  
28                   David R. Paramore  
                        USSS Task Force Officer

1 Subscribed to and sworn this 9  
2 day of July, 2025.

3   
4 THE HONORABLE KEVIN F. MCDONALD  
5 UNITED STATES MAGISTRATE JUDGE

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